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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA**

In re

**JOHN HENRY SCHNEIDER,**

**Case No. 14-61357**

Debtor.

**STIPULATION RE 2004 EXAM AND SUBPOENA**

Trustee Joseph V. Womack, as Chapter 7 Trustee for the Bankruptcy Estate of John Henry Schneider (“Trustee”), through counsel, and Debtor John Henry Schneider, through counsel, submit the following stipulation regarding Debtor’s Motion for Reconsideration (Doc. 115) and Debtor’s Objection and Motion to Quash Subpoena (Doc. 132). The parties hereby stipulate and agree as follows:

1. Trustee filed his Motion for Rule 2004 Examination of Greear, Clark, King, P.C. on March 17, 2015 (Doc. 109), requesting production of various documents. The Court granted Trustee's motion on March 18, 2015 (Doc. 110) and authorized issuance of a subpoena.

2. Trustee served the subpoena on Greear, Clark, King, P.C. on March 23 2015. Doc. 126.

3. Debtor filed his Motion for Reconsideration (Doc. 115) on March 20, 2015. Debtor filed his Objection and Motion to Quash Subpoena (Doc. 132) on March 31, 2015. Hearing on these motions is set for April 28, 2015.

4. In order to resolve the present discovery dispute, the parties hereto stipulate as follows:

- a. Greear, Clark, King, P.C. shall produce all documents for which a privilege is not claimed. All such documents shall be produced to the Trustee, in electronic form, on or before April 20, 2015;
- b. For all documents for which a privilege is claimed, Greear, Clark, King, P.C. shall produce a privilege log when it produces the documents for which a privilege is not claimed; and
- c. After production of documents and the privilege log, any disputes regarding privileges may be brought before the Court by any party.

5. A proposed order is submitted herewith.

DATED this 14th day of April, 2015.

GOETZ, BALDWIN & GEDDES, P.C.

By: /s/Trent M. Gardner

Trent M. Gardner/Jeffrey J. Tierney  
Attorneys for Trustee Joseph V. Womack

DYE & MOE, P.L.L.P.

By: /s/Harold V. Dye

Harold V. Dye  
Attorney for Debtor

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies under penalty of perjury that on April 14, 2015, a copy of the foregoing pleading was served (i) by electronic means pursuant to LBR 9013-1(d)(2) on the parties noted in the Court's ECF transmission facilities and/or (ii) by mail on the following parties: None.

/s/Trent M. Gardner

Trent M. Gardner  
Attorneys for Trustee Joseph V.  
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